



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

April 17, 2020

MEMORANDUM

SUBJECT: Response to Office of Inspector General Draft Report No. OA&E-FY18-072, *"Further Efforts Needed to Uphold Scientific Integrity at EPA"* dated February 12, 2020

FROM: Doug Benevento //s//
Associate Deputy Administrator

TO: Patrick Gilbride
Director, Environmental Research Programs Directorate
Office of Audit and Evaluation
Office of Inspector General

EPA welcomes the opportunity to review and comment on the OIG's draft report titled *"Further Efforts Needed to Uphold Scientific Integrity at EPA"* (Project No. OA&E-FY18-072) (Draft Report).

The process used to collect information for this report included extensive interviews, surveys, and an in-depth review of EPA scientific integrity initiatives. The report addresses the implementation of the Scientific Integrity Policy (adopted in February 2012), including the extent and type of employee scientific integrity concerns, employee awareness of the Scientific Integrity Policy, reasons potential violations may not be reported, and the process by which the Agency responds to and resolves allegations of scientific integrity violations. The report did not look at peer review or the Federal Advisory Committee Act, nor does it imply that any science conducted by the Agency is, was or has any deficiency. Accordingly, we believe the term "process" should be added to the report's title to more accurately reflect the substance of the report and prevent any inadvertent misrepresentations to the public. Such an adjusted title would read as follows: "Further Efforts Needed to Uphold Scientific Integrity *Process* at EPA."

For your consideration, we have included a Technical Comments Attachment to supplement this response.

AGENCY'S OVERALL POSITION

The Offices of the Administrator and Research and Development appreciate the OIG's recognition that EPA has taken valuable steps to build capacity, invest in, and maintain agency expertise in scientific integrity. We are confident that the work conducted at the Agency everyday rests upon a strong foundation of science, and we believe the overall findings of the OIG report support that conclusion. We are grateful with the findings in the report that demonstrate that science within the Agency is respected throughout the Agency:

A majority of respondents were positive about five areas of culture --- specifically, their ability to:

- Express scientific views in their personal capacity, and not representative of the Agency.
- Openly express scientific opinions in the Agency without fear of retaliation.
- Observe consistent support by their management chains for scientifically defensible positions.
- Provide input on scientific content relying on their research.
- Experience no alteration or suppression of their research findings outside of technical merit.

We believe that improvement is a process and not an endpoint and we will always seek improvement and do appreciate much of the constructive guidance in the report.

Finally, an important clarification regarding the Agency Action Official the OIG has identified to address recommendations 2 through 12: the EPA Science Advisor is the appropriate responsible Agency Official to address these recommendations and in some cases with the assistance of the OA and the Office of Mission Support. In accordance with the EPA Scientific Integrity Policy, the EPA Science Advisor does this work in their capacity as EPA Science Advisor and not as the Assistant Administrator for Research and Development. The Assistant Administrator responsibilities are distinct from the cross-Agency responsibilities of the EPA Science Advisor.

AGENCY'S RESPONSE TO REPORT RECOMMENDATIONS

AGREEMENTS

No.	Recommendation	High-Level Intended Corrective Actions	Estimated Completion
1.	Determine the extent and cause of the culture and “tone at the top” concerns, based on the indicators from the OIG’s scientific integrity survey. Issue the results to all EPA staff and make available to the public.	<p>1. We would first note that we cannot find the words “tone at the top” being surveyed and find its use in quotes in this recommendation unfortunate.</p> <p>2. The EPA Deputy Administrator, in cooperation with the EPA Science Advisor, will work with the Administrator to devise an action plan to address this recommendation. The EPA’s Deputy Administrator, Science Advisor, Scientific Integrity Official and the Scientific Integrity Committee will analyze the OIG scientific integrity survey, together with previous surveys of EPA, EVS results, FMFIA reports and reports of alleged violations of the EPA Scientific Integrity Policy to inform this plan.</p>	September 30, 2020
2.	With the assistance of the Scientific Integrity Committee, develop and identify which performance measures will be used to define Scientific Integrity Program success and effective Scientific Integrity Policy implementation.	2. EPA will develop an evaluation/assessment plan to examine and augment the metrics already in place and create a plan for gathering and analyzing these data and applying those results to further refine and improve EPA’s scientific integrity work.	December 30, 2021
3.	With the assistance of the Scientific Integrity Committee, develop and execute a plan, including resource needs and milestones, to address the remaining action items identified by the agency to improve the implementation of its Scientific Integrity Policy.” (Appendix A)	3. EPA will develop a detailed plan to include the action items in Appendix A with corrective actions, milestones, planned completion dates, and resource needs. The ScIO and ScIC will develop the plan and track implementation of the action items.	January 30, 2021

4.	In coordination with the Assistant Administrator for Mission Support and the Scientific Integrity Committee, develop and implement a process for tracking completion of scientific integrity training for all new employees, including senior leadership and political appointees	<p>4.1 The Agency has implemented a process for tracking completion of onboarding training for career employees. Beginning in 2016, the SciI program has provided Agency-wide onboarding scientific integrity training for all new non-SES career employees. We currently receive monthly reports on training completion from the training office in the Office of Mission Support.</p> <p>4.2 For new SES members, OMS has agreed that a briefing by the Scientific Integrity Official will be included in future onboarding.</p> <p>4.3 For senior schedule C employees, OMS will forward the names of new hires to the Scientific Integrity Official for in person briefings</p> <p>4.4 For all other schedule C hires, the Scientific Integrity Onboarding Training will be included in their onboarding training assignments.</p>	July 31, 2020
5.	Provide updated information on scientific integrity training completion rates to Scientific Integrity Committee members and supervisors.	5. The Scientific Integrity Program will continue to analyze the reports from OMS to identify those who fail to initiate and/or complete the onboarding training within the prescribed time period. We will continue to compile these data quarterly and share with the Scientific Integrity Committee members to enable them to make sure this requirement is fulfilled.	Completed on March 4, 2020
6	In coordination with the Assistant Administrator for Mission Support, complete the development and implementation of the electronic clearance system for scientific products across the agency.	6. OMS, ORD Office of Scientific Information Management (OSIM), and the Scientific Integrity Committee will coordinate to complete modification and Agency-wide implementation of ORD's Scientific & Technical Information Clearance System (STICS) to an agency-wide electronic clearance system for scientific products across the Agency. The system will be consistent with the Scientific Integrity Policy and our Best Practices document and with the Agency's Plan to Increase Access to the Results of EPA-Funded Scientific Research.	June 30, 2022

7.	With the assistance of the Scientific Integrity Committee, finalize and release the draft procedures for addressing allegations of a violation of the Scientific Integrity Policy and incorporate the procedures into scientific integrity outreach and training materials.	<p>7.1 The Agency will release the Procedures document. It will be posted on the Agency's website ([HYPERLINK "https://www.epa.gov/osa/procedure-for-allegations"]) by April 30, 2020.</p> <p>7.2 The Sci Program will create and release appropriate outreach materials to ensure EPA employees and their managers understand these procedures.</p>	April 30, 2020
8.	With the assistance of the Scientific Integrity Committee, develop and implement a process to adjudicate allegations of Scientific Integrity Policy violations involving high-profile issues or senior officials in the agency for which the Scientific Integrity Official or Scientific Integrity Committee does not feel it can adequately adjudicate via existing procedures; include an indicator for when the process should be used.	8. EPA will amend the procedures document referenced in recommendation 7, to include a process to adjudicate allegations of Scientific Integrity Policy violations involving high-profile issues or senior officials in the Agency for which the Scientific Integrity Official or Scientific Integrity Committee does not feel it can adequately adjudicate via existing procedures, and include an indicator for when the process should be used.	June 30, 2021
9.	With the assistance of the Scientific Integrity Committee, finalize and implement a charter or procedures to clarify the roles and responsibilities of Scientific Integrity Committee members.	9. A charter is posted on the Agency internet and intranet sites. ([HYPERLINK "https://www.epa.gov/osa/scientific-integrity-committee-charter"])	Completed on March 19, 2020

10.	Include in the Scientific Integrity Program's annual reporting on allegations of scientific integrity violations (as applicable and to the extent that privacy allows): (a) adjudication outcome; (b) description of the process used to reach the adjudication outcome; (c) description of corrective actions and/or any longer-term changes or consequences to address the cause of substantiated violations; (d) whether and how the allegation was resolved through the advice/assistance process.	The Agency will address these recommendations in accordance with the process laid out in the Guidance for Addressing allegations. The SI Committee will work with organizational management as necessary.	December 30, 2020
11.	With the assistance of the Scientific Integrity Committee, finalize and post to the EPA's public website prior year Annual Reports on Scientific Integrity.	11. The ScIO and the ScIC will complete and post FY2018 and 2019 annual reports.	July 31, 2020
12.	Develop a timeline or procedure that ensures the prior fiscal year annual report on scientific integrity is completed and distributed before the annual agency wide meeting on scientific integrity.	12. We will develop a timeline to ensure the prior fiscal year annual report is available at the next Agency-wide annual meeting on Scientific Integrity, which is planned for July 2020.	July 31, 2020

Attached please find specific comments on the Draft Report. We request the OIG include our full response to the Draft Report, including the attachment of detailed technical comments.

If you have any questions regarding this response, please contact Francesca Grifo, Scientific Integrity Official, ORD at [[HYPERLINK "mailto:grifo.francesca@epa.gov"](mailto:grifo.francesca@epa.gov)].

Attachment

cc: Jennifer Orme-Zavaleta
Scientific Integrity Committee